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December 5, 2019

VIA ECF

Honorable Judge Jack B. Weinstein
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Chalamo Kaikov v. Arihay Kaikov, et al.*
Docket No.: 19-CV-02521; File No.: L2805

Dear Judge Weinstein:

Please be advised that this office represents Defendants Arihay Kaikov, Pacific 2340 Corp., Royal A&K Realty Group, Inc., A&E.R.E. Management Corp., NY Prime Holding, LLC, and AG Realty Bronx Corp. (collectively, the “Kaikov Defendants”) in the above-referenced matter. We submit this letter application, upon consent of all parties, to request a 10-day extension of the briefing schedule regarding Defendants’ Motion to Dismiss Plaintiff’s First Amended Complaint. If this Court is amenable to this request, the new date for the Kaikov Defendants’ reply brief to be filed would be December 23, 2019. The extension should not affect any other deadlines.

To briefly memorialize, the parties submitted a briefing schedule on September 16, 2019 regarding Defendants’ Motion to Dismiss Plaintiff’s First Amended Complaint, which was approved by Magistrate Reyes on September 17, 2019. *See* DE 22. The Court then granted Plaintiff’s request to extend the briefing schedule, requiring Defendants’ to submit reply briefs by December 13, 2019. *See* DE 29. Defendants received Plaintiff’s opposition on November 25, 2019. *See* DE 32.

The reason for this request is that, unfortunately, the undersigned was ill and unable to work on the matter until Wednesday of this week due to a stomach illness. In addition, due to scheduling difficulties, the undersigned is required to appear on three court appearances in different jurisdictions next week, in addition to two federal depositions that are anticipated to take the full day. As such, counsel respectfully requests that this Court grant this application for a brief extension of the return date. This is the first request by the Kaikov Defendants for an extension of the reply brief.



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We thank the Court for its time and consideration.

Respectfully submitted,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

By: /s/ Daniel S. Hallak
Daniel S. Hallak

cc: All counsel (via ECF)